



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

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Brooklyn, New York 11201*

January 18, 2024

By ECF

Honorable James R. Cho
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Greene Johnson v. United States*, Civil Action No.: 23-cv-08506 (Cho, M.J.)

Dear Judge Cho:

This Office represents the United States (“Defendant”) in the above-referenced action. With the consent of Plaintiff’s counsel, the United States writes to respectfully request a two-week extension of time, from January 22, 2024 to February 5, 2024, to answer, move, or otherwise respond to the Plaintiff’s Complaint.

By way of background, Plaintiff Helen Greene Johnson, as administrator of the estate of Khalil Islam, initiated this action on November 16, 2023, asserting tort claims against the United States arising from the prosecution, conviction, and imprisonment of Mr. Islam by the New York County District Attorney’s Office in 1966. *See* Dkt. No. 1. This request for extension is being made to permit additional time for this Office to confer with its agency client, the Federal Bureau of Investigations, in order to respond to the Complaint.

This is the first application by any party for an extension of any kind in this action. This request does not affect any other deadlines. Again, as noted above, this request is being made with Plaintiff’s consent.

Defendant thanks the Court for its consideration of this request.

Respectfully submitted,

BREON PEACE
United States Attorney

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cc: All counsel of record (by ECF)